1	ADAM PAUL LAXALT	
2	Attorney General LAWRENCE VANDYKE (Bar No. 13643)	
3	Solicitor General JOSEPH TARTAKOVSKY (Bar. No. 13796)	
4	Deputy Solicitor General STEVE SHEVORSKI (Bar No. 8256)	
5	Head of Complex Litigation State of Nevada	
6	Office of the Attorney General 555 E. Washington Avenue, Suite 3900 Las Vegas, Nevada 89101	
7	(702) 486-3783 (phone) (702) 486-3773 (fax)	
8	lvandyke@ag.nv.gov jtartakovsky@ag.nv.gov	
9	sshevorski@ag.nv.gov	
10	Attorneys for Defendant Secretary of State	
11		
12	UNITED STATES DISTRICT COURT	
13	DISTRICT OF NEVADA	
14 15	NORA LUNA; BILAL SHABAZZ; DIANE CRUMP-RICHMOND; SUSAN FLORIAN; and DEMI FALCON	CASE NO. 2:17-cv-02666-JCM-GWF
16	Plaintiffs,	STIPULATION AND ORDER TO STAY DISCOVERY
17	vs.	(First Request)
18	BARBARA CEGAVSKE, in her official capacity as the Nevada Secretary of State;	(======================================
19	and JOSEPH GLORIA, in his official capacity as the Clark County Registrar of	
20	Voters,	
21	Defendants.	
22	Defendant Barbara Cegavske in her official capacity as Nevada Secretary of State,	
23	by and through her counsel of record, Defendant Joseph Gloria in his official capacity as	
24	Clark County Registrar of Voters, and Plaintiffs Nora Luna, Bilal Shabazz, Diane Crump-	
25	Richmond, Susan Florian and Demi Falcon, by and through their counsel of record,	
26	stipulate and agree that good cause exists to stay discovery in this matter pending	
27	resolution of state court proceedings that ma	ay moot this litigation.

Case 2:17-cv-02666-JCM-GWF Document 53 Filed 12/26/17 Page 2 of 4

WHEREAS, the Court, in its order vacating the hearing on Plaintiffs' motion for preliminary injunction and Defendants Cegavske and Gloria's respective motions to dismiss, has found that the state court proceedings (Case #A-17-764587-C) "could render plaintiffs' federal complaint moot." (ECF No. 42 at 3:5-7).

WHEREAS, in light of the Court's order (ECF No. 42) and the potential mooting effect that the pending state court proceedings may have on this litigation, the parties have met and conferred in good faith and have agreed that good cause supports a stay of all discovery, including the parties' obligation to submit a discovery plan to the Court, to conserve the parties' resources and in the interests of judicial economy.

In light of the foregoing, the parties stipulate and agree as follows:

- 1. All discovery deadlines, including the parties' obligation to submit a discovery plan to the Court, are stayed pending the resolution of the state court proceedings;
- 2. The parties agree to meet and confer within fourteen (14) days of the state court proceeding's termination in order to form a discovery plan and will submit a discovery plan to the Court within 30 days of the state court proceeding's termination; and
- 3. Any party, after providing 5 days' written notice to all parties in this action, may apply via written motion to lift the stay of discovery.

| | | | | | | |

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20 | / / /

21 ///

22 | ///

23 ///

24 ///

25 ///

26 ///

27 | | / / /

28 ////

1	Dated this 26th day of December, 2017.	Dated this 26th day of December, 2017.
2 3	ADAM PAUL LAXALT Attorney General	WOLF RIFKIN SHAPIRO SCHULMAN & RABKIN, LLP
4		
5	By: /s/ Steve Shevorski	By: <u>/s/ Bradley Schrager</u> BRADLEY SCHRAGER
6	LAWRENCE VANDYKE Solicitor General JOSEPH TARTAKOVSKY	BRADLEY SCHRAGER DANIEL BRAVO 3556 E. Russell Rd., 2 nd Fl.
7	Deputy Solicitor General STEVE SHEVORSKI	Las Vegas, NV 89120
8 9	Head of Complex Litigation 555 E. Washington Ave., Ste. 3900 Las Vegas, Nevada 89101	MARC E. ELIAS (Pro hac vice to be submitted) JACKIE L. ANDERSON
10	Attorneys for Defendant Barbara Cegavske	(Pro hac vice to be submitted) PERKINS COIE LLP
11		700 Thirteenth Street, N.W., Ste. 600 Washington, D.C. 20005
12		Sambo Dul (Pro hac vice to be submitted)
13 14		Perkins Coie LLP 2901 N. Central Ave., Ste. 2000 Phoenix, AZ 85012
15		Attorneys for Plaintiffs
16	///	, , ,
17	111	
18	111	
19	111	
	111	
21	/// ///	
22	111	
23	/// ///	
24		
28	111	

1	Dated this 26th day of December, 2017.	
2	STEVEN B. WOLFSON District Attorney	
3		
4	By <u>/s/ Mary-Anne Miller</u> STEVEN B. WOLFSON	
5	District Attorney CIVIL DIVISION	
6	MARY-ANNE MILLER	
7	County Counsel 500 South Grand Central Pkwy. Las Vegas, Nevada 89155	
8	Attorneys for Defendant, Joseph Gloria	
9	$\underline{\text{ORDER}}$	
10	IT IS SO ORDERED.	
11	DATED this <u>27th</u> day of December, 2017.	
12	DATED tills day of December, 2017.	
13		
14	Leonae Foles O	
15	UNITED STATES MAGISTICATE JUDGE	
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		